1 2 3 4 5 6 7 8 9	SIGAL CHATTAH United States Attorney District of Nevada Nevada Bar No. 8264 KARISSA D. NEFF Assistant United States Attorney Nevada Bar No. 9133 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 Phone: (702) 388-6336 Karissa.Neff@usdoj.gov Attorneys for the United States UNITED STATES I	DISTRICT COURT
10	DISTRICT OF NEVADA	
11	Jorge Luis Ramirez Lopez,	Case No. 2:24-cv-01595-CDS-BNW
12	Plaintiff	Order Approving Stipulation to
13	V.	Extend Federal Defendants' Deadline to File Reply in Support of its Cross-motion for Summary Judgment
14 15	Clyde A. Moore, Field Office Director, for Las Vegas Nevada, U.S. Citizenship and Immigration Services, in his official capacity	(Third Request)
16	as well as his successors and assigns, et al.	[ECF No. 32]
17	Defendants	
18	Plaintiff, Jorge Luis Ramirez Lopez, through counsel and the United States of	
19	America on behalf of Federal Defendants ("Federal Defendants"), through undersigned	
20	counsel, hereby stipulate and agree as follows:	
21	1. On January 28, 2025, the Court entered an order approving the stipulated	
22	briefing schedule establishing the following deadlines: Plaintiff's motion for summary	
23	judgment was to be filed by March 7, 2025; Federal Defendants' opposition and combined	
24	cross-motion for summary judgment was due by April 4, 2025; Plaintiff's reply in support	

2. Subsequent to that order, the Court granted Federal Defendants three

judgment was to be filed by April 25, 2025; and Federal Defendants' reply in support of its

of his motion and his opposition to Federal Defendants' cross-motion for summary

cross-motion for summary judgment was to be filed on May 9, 2025. (ECF No. 13).

26

27

28

extensions to file their opposition and cross-motion, ultimately extending their deadline from April 4, 2025, to April 17, 2025. (ECF No. 21).

- 3. Federal Defendants filed their opposition to Plaintiff's motion for summary judgment and cross-motion for summary judgment on April 17, 2025. (ECF No. 22, 24).
- 4. The parties subsequently entered into a stipulation and order granted by this Court extending the time for Plaintiff to file their reply in support of their motion for summary judgment and their response to Federal Defendants' cross-motion for summary judgment through May 9, 2025. (ECF No. 26).
- 5. Plaintiff filed his reply in support of his motion for summary judgment and to Federal Defendants' cross-motion for summary judgment on May 9, 2025. (ECF No. 27).
- 6. Per the stipulated briefing schedule, Federal Defendants' reply in support of its Cross-Motion for Summary Judgment was initially due on May 9, 2025 (ECF No. 13).
- 7. Because the dates were extended in the initial stipulated briefing schedule such that Plaintiff filed his reply in support of his motion for summary judgment and to Federal Defendants' cross-motion for summary judgment on May 9, 2025, the parties requested that the Court extend the deadline for Federal Defendants to file their reply in support of its counter-motion for summary judgment from May 9, 2025 through May 30, 2025 (ECF No. 28).
- 8. The Court granted the parties first request to extend the deadline for the Federal Defendants to file their reply in support of its counter-motion for summary judgment to May 30, 2025 (ECF No. 29).
- 9. The parties requested that the Court extend the deadline for the Federal Defendants to file their reply in support of its counter-motion for summary judgment from May 30, 2025 through June 6, 2025, as there is a Federal Holiday and to accommodate Federal Defendants' counsels' work load as she has ENE evaluation statement due and a settlement conference in a discrimination case that conflicted with the existing deadline (ECF No. 30).

1 10. The Court granted the parties second request to extend the deadline for the 2 Federal Defendants to file their reply in support of its counter-motion for summary 3 judgment to June 6, 2025 (ECF No. 31). 4 11. The parties are requesting that the Court extend the deadline for the Federal 5 Defendants to file their reply in support of its counter-motion for summary judgment from 6 June 6, 2023 through June 13, 2025, as Federal Defendant's Counsel was out of town 7 attending to a different case matter and has two other substantive motions due this week. 8 12. Good cause exists for this extension, as it will allow Federal Defendants' 9 counsel time to review Plaintiff's filing to prepare a thorough and complete reply. 10 Accordingly, the parties respectfully request that the Court extend the deadline for 11 Federal Defendants to file its reply in support of its cross-motion for summary judgment 12 from June 6, 2025, through June 13, 2025. This stipulation is requested in good faith and 13 not for the purpose of undue delay. 14 Respectfully submitted this 5th day of June of 2025. 15 16 SIGAL CHATTAH United States Attorney 17 /s/ Maria E. Quiroga /s/ Karissa D. Neff 18 KARISSA D. NEFF MARIA E. QUIROGA, ESO. Nevada State Bar No. 13939 Assistant United States Attorney 19 7935 W. Sahara Ave., Suite 103 Las Vegas, Nevada 89117 Attorneys for the United States 20 Attorney for Plaintiff 21 22 23 IT IS SO ORDERED: 24 25 UNITED STATES DISTRICT JUDGE 26 **DATED:** June 10, 2025 27 28